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\*NOT ADMITTED IN DC

June 25, 1993

RECEIVED

JUN 25 1993

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Ms. Donna L. Searcy, Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

Re: Home Shopping, MM Docket No. 93-8  
Ex Parte Presentations

Dear Ms. Searcy:

Enclosed, pursuant to §1.1206(a)(1) of the FCC Rules, are two copies each of identical letters that are this day being delivered to the offices of Chairman Quello and Commissioners Barrett and Duggan. I understand from Mr. Sams of your office that this proceeding is not presently in a Sunshine Agenda period.

Sincerely,

*Sidney White Rhyme*

Sidney White Rhyme  
Counsel for KX Acquisition Limited  
Partnership

SWR/wp  
Enclosures

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June 25, 1993

Honorable Andrew C. Barrett  
Federal Communications Commission  
1919 M Street, N.W., Room 826  
Washington, D.C. 20554

Re: Home Shopping, MM Docket No. 93-8  
Ex Parte Presentation

Dear Commissioner Barrett:

I write on behalf of the licensee of Television Stations KXLI, St. Cloud, and KXLT-TV, Rochester, both in Minnesota--to urge you to find that those stations serve the public interest and hence are entitled to be carried on cable systems in their service areas. As detailed in extensive Comments dated March 12, 1993, filed in this docket by the stations' general manager, this may be a matter of life-or-death for these stations. It will certainly be a principal determinant of whether they will be able to expand their local public service programming.

KXLI is the only station in the vast Minneapolis-St. Paul ADI that is not either licensed to the Twin Cities or a satellite of a station that is licensed to the Twin Cities. KXLT-TV, in the Rochester-Austin-Mason City ADI, is a satellite of KXLI. Both stations for the last year-and-a-half have carried predominantly programming of the Home Shopping Network.

Both also carry public service programming, including such programming that is locally produced, and children's programming. Their general manager has conceded in his Comments that they have done more such programming in the past, and would like to do more now. But in more than ten years of operation they have never operated in the black except for years they have carried the Home Shopping Network. They were actually forced to go dark from 1988 to 1990. With HSN revenues, they are now at least back on the air.

Honorable Andrew C. Barrett  
June 25, 1993  
Page 2

The principal financial problem is that the stations are denied carriage on every cable system that serves the greater Twin Cities metro area. They are even denied coverage on the cable systems that serve their communities of license, St. Cloud and Rochester.

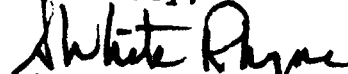
According to the 1993 Television & Cable Factbook, pp. 876 and 880, the cable penetration in St. Cloud and Rochester is greater than 84% in each city. Therefore, the stations are seen in less than 16% of the homes in the very communities that they are licensed by the Commission to serve. And their programming schedules are not even carried in the local newspapers because they are not on cable.

The cable systems in both St. Cloud and Rochester are controlled by the group owner that also owns QVC, cable's own competitive shopping service. There is no way that KXLI and KXLT-TV will get on those systems without "must carry" rights. And there is no way that KXLI and KXLT-TV will be able to expand their local public service programming without the increased audience resulting from cable carriage.

KXLT-TV also holds a permit to construct a translator in Austin, Minnesota, where cable penetration is 66% and the system is owned by the same operator. It has been unable to build that translator, and will probably be unable to do so without "must carry" rights. Thus, new service is being denied.

I ask that you consider these stark facts in making your public interest determination. I would be pleased to furnish further information or to meet with you and/or your staff at any time.

Sincerely,



Sidney White Rhyme  
Counsel for KX Acquisition LP  
Licensee of KXLI(TV) and KXLT-TV

SWR/wp

cc: FCC Secretary (two copies  
per §1.1206(a)(1) of Rules)